

Patrick J. Reilly  
Nevada Bar No. 6103  
BROWNSTEIN HYATT FARBER SCHRECK, LLP  
100 North City Parkway, Suite 1600  
Las Vegas, Nevada 89106  
Telephone: 702.382.2101  
Facsimile: 702.382.8135  
[preilly@bhfs.com](mailto:preilly@bhfs.com)

Christopher L. Ottele (appearing *pro hac vice*)  
BROWNSTEIN HYATT FARBER SCHRECK, LLP  
675 15th Street, Suite 2900  
Denver, Colorado 80202  
Telephone: 303.223.1100  
[cottele@bhfs.com](mailto:cottele@bhfs.com)

*Attorneys for Marigold Mining Company*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

DANIEL FEWKES, individually and on behalf  
of all others similarly situated,

Plaintiff,

vs.

MARIGOLD MINING COMPANY,

Defendant.

Case No.: 2:25-cv-00241-JAD-DJA

**STIPULATION AND ORDER TO  
EXTEND DEADLINE TO RESPOND TO  
COMPLAINT**

**(First Request)**

**STIPULATION**

Plaintiff Daniel Fewkes, individually and on behalf of all others similarly situated (“Plaintiffs”), by and through his counsel of record, Esther C. Rodriguez, Esq., of Rodriguez Law Offices, P.C., Andrew W. Dunlap, Esq., of Josephson Dunlap LLP, and Richard J. Burch, Esq. of Bruckner Burch PLLC, and Defendant Marigold Mining Company (“Marigold”), by and through its counsel of record, Patrick J. Reilly, Esq., of the law firm of Brownstein Hyatt Farber Schreck, LLP, hereby stipulate and agree as follows:

1. On February 4, 2025, Plaintiffs filed their Original Class and Collective Action Complaint and Demand for Jury Trial (EFC No. 1) (the “Complaint”).

///

32807922

2. Plaintiffs have agreed to grant an extension for Marigold to answer or otherwise respond to the Complaint, to allow Marigold to investigate the matter, which contains numerous factual allegations.

3. Marigold shall have up to, and including, March 19, 2025, in which to answer or otherwise plead in response to Plaintiffs' Complaint.

4. This stipulation is brought in good faith by all parties and not for purposes of delay. This extension will not result in any undue delay in the administration of this case.

5. This is the first request for extension of time requested by the parties with respect to responding to the Complaint.

DATED this 10<sup>th</sup> day of March, 2025.

DATED this 10<sup>th</sup> day of March, 2025.

/s/ Will Hogg

Esther C. Rodriguez, Esq.  
Rodriguez Law Offices, P.C.  
10161 Park Run Drive, suite 150  
Las Vegas, NV 89145

/s/ Patrick J. Reilly

Patrick J. Reilly, Esq.  
Brownstein Hyatt Farber Schreck, LLP  
100 North City Parkway, Suite 1600  
Las Vegas, NV 89106

Andrew W. Dunlap, Esq. (*pro hac vice*)  
Will Hogg (*pro hac vice*)  
Josephson Dunlap LLP  
11 Greenway Plaza, Suite 3050  
Houston, TX 77046

Christopher L. Ottele (*pro hac vice*)  
BROWNSTEIN HYATT FARBER  
SCHRECK, LLP  
675 15th Street, Suite 2900  
Denver, Colorado 80202

Richard J. Burch, Esq. (*pro hac vice*)  
Bruckner Burch PLLC  
11 Greenway Plaza, Suite 3025  
Houston, TX 77046

*Attorneys for Marigold Mining Company*

*Attorneys for Plaintiffs*

### **ORDER**

IT IS SO ORDERED.

  
DANIEL J. ALBRECHTS  
UNITED STATES MAGISTRATE JUDGE

DATED: 3/11/2025